

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ISIAM RAY FRIAR,

Plaintiff,

-against-

WYNDHAM VACATION RESORTS, INC.,
DERRICK TAYLOR, and MARIA MAESE

Defendants.

Civil Action No: 1:20-cv-02627 (JPO)

**NOTICE OF MOTION FOR DEFAULT
JUDGMENT**

PLEASE TAKE NOTICE that upon the accompanying Affidavit of Jon T. Powers in Support of Motion for Default Judgment Filed by Defendant, Wyndham Vacation Resorts, Inc. dated June 7, 2021, and upon all papers and proceedings had herein, Defendant, Wyndham Vacation Resorts, Inc. (“WVR”) will move this Court, before the Honorable J. Paul Oetken, at the United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007 on a date and at a time to be designated by the Court, for an Order: (i) granting WVR’s Motion for Default Judgment against Plaintiff Isiam Ray Friar; (ii) entering judgment in favor of WVR and against Plaintiff on WVR’s Counterclaim; and (iii) awarding WVR its contractual damages against Plaintiff with pre-judgment interest in the total amount of \$168,343.57.

DATED: June 7, 2021
 Newark, New Jersey

K&L GATES LLP

By: /s/ Jon T. Powers
Jon T. Powers, Esq.
One Newark Center, 10th Floor
Newark, New Jersey 07016
Tel: (973) 848-4000

Fax: (973) 848-4001
Email: travis.powers@klgates.com

*Counsel to Wyndham Vacation Resorts,
Inc., Derrick Taylor, and Maria Maese*

TO: Isiam Ray Friar
1717 E. Vista Chino, A-7 #1133
Palm Springs, California 92262
Plaintiff